## REMARKS

Claims 3-6 are pending and have been finally rejected. Claim 3 has been amended to include an appropriate antecedent basis for the limitation "the words." Claim 3 has also been amended to clarify that the document comprises textual words and that the textual words of the document are the subjects of the recited comparison with the key word in the key word file. Claim 6 has similarly been amended to conform to the recitations of claim 3. The amendments are offered to comply with the formal requirement set forth by the Examiner, and to place the claims in better form for consideration on appeal. No new matter has been added. Accordingly, claims 3-6 are now presented for further consideration.

Claims 3-6 stand rejected under 35 USC 112, second paragraph, for alleged indefiniteness. The PTO is heard to object to the term "the words" in line 7 of claim 3 as lacking adequate antecedent basis. Applicant submits that present claim 3 fully complies with section 112, and respectfully requests withdrawal of the rejection on this basis.

Claims 3-6 also stand finally rejected under 35 USC 102(e) as allegedly anticipated by Tribbeck, of record. Applicant must reiterate that Tribbeck is directed to an entirely different invention than that presently claimed, and does not identically disclose every limitation of the present claims. Tribbeck discloses methods for making displayed documents that include hyperlinks more easily readable by analyzing the hyperlinks and replacing them with descriptive text representative of the subject matter to which the hyperlinks relate. See paragraph 0058. Tribbeck thus actually discloses methods which are the reverse of those presently claimed. Tribbeck turns hyperlinks into textual words, which are combined with the displayed document to produce a modified document including additional textual words. The presently claimed invention, in sharp contrast, examines textual words in a document that includes a plurality of textual words, and when the textual words are identified as key words found in key word files, it turns the textual words into linking means, such as hyperlinks. Such a reversed procedure is not identically disclosed, nor suggested or even contemplated, by Tribbeck.

With respect to present claim 3, Tribbeck does not identically disclose a method for converting a textual word in a document comprising a plurality of textual words into a linking means, as established above. Tribbeck fails identically to disclose the step of identifying at least one textual word as a key word and storing the key word in a key word file. Rather than identifying textual words, Tribbeck examines keywords obtained by processing a link data item 24 (paragraph 0055). Tribbeck also fails identically to disclose the step of associating the key word with any linking

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means, whether a hyperlink or some other linking means, associated with predefined data. Tribbeck's keywords are not associated with a linking means, but rather are compared against categories associated with a sequence of preselected keywords, and thus matched to a particular category. Once Tribbeck matches a keyword with a suitable category, category data, not a linking means, are then inserted into the original displayed document (paragraph 0058). Again, Tribbeck does not identically disclose comparing textual words in a document with any key word in a key word file, but instead categorizes keywords obtained by processing link data items. Finally, since Tribbeck does not determine whether textual words in the document correspond to any key words in key files, the reference also fails identically to disclose converting textual words so evaluated into linking means with which the key words are associated.

Figures 11, 14 and 15, cited by the PTO, do not support the rejection of present claim 3. Examination of Figure 11 reveals that Tribbeck processes a displayed web page 78 including a link data item 80, together with a thumbnail 82. The displayed web page 78 is thus determined to be insufficiently readable. Tribbeck then processes the link data item to extract the name "John Smith", inserts this name as new text in place of the original link data item 80, removes the thumbnail 82, and generates a new, more readable web page 84. This is entirely different from, indeed the reverse of, the method of present claim 3. In the context of Tribbeck Figure 11, the method of present claim 3 identifies the textual words "John Smith" as key words and stores them in a key word file. In the key word file, "John Smith" is associated with a linking means, such as a hyperlink, which is associated with predefined data, such as an advertiser's web page (present disclosure paragraph 0029). Then, the present method compares the textual words in a document comprising a plurality of textual words. When the textual words "John Smith" are located, they are converted into the linking means. Thus, the textual words "John Smith" are replaced in the document by the linking means associated with the key words "John Smith".

Rather than generating a new web page which is easier to read by inserting new text in the place of a link data item, the present method takes text present in a document and replaces it with a linking means. Clearly, Tribbeck does not identically disclose such a method. Indeed, converting textual words in a document into additional linking means would render the document even less readable than the original document, inconsistent with and directly contrary to Tribbeck.

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Likewise, Figures 14 and 15 do not illustrate converting a textual word into a linking means, but simplifying a series of linked web pages. With respect to link 136 added to a lower page (paragraph 0106), applicant notes that this insertion does not constitute conversion of a textual word into a linking means, nor does it constitute use of a linking means associated with *predefined* data. Rather, the inserted link refers to a top page in a hierarchy which is to be viewed; such a top page does not constitute predefined data.

For all of the foregoing reasons, Tribbeck fails to anticipate present claim 3. Withdrawal of the Section 102 rejection on this basis is earnestly solicited.

Claims 4-6, dependent on claim 3, are likewise not anticipated by Tribbeck. With respect to claim 4, since Tribbeck fails identically to disclose the method of claim 3, which recites linking means, the reference fails to disclose methods limited to particular embodiments of linking means, namely hyperlinks. With respect to claims 5 and 6, to the extent Tribbeck discloses any key word files transferred to a user computer, and any comparison performed on such a computer, the reference only makes such a disclosure as part of the general method taught by the reference. These disclosures cannot compensate for the inadequacies of Tribbeck as a Section 102 teaching, as established above. Claims 4-6 thus are not anticipated by Tribbeck for these additional reasons.

As all of the limitations of the present claims are not identically disclosed by Tribbeck, applicant courteously requests withdrawal of the Section 102 rejections based on this reference.

In view of the amendments to the claims and the foregoing remarks, it is submitted that all present claims are in condition for allowance. Should the Examiner have any questions, he is invited to contact the undersigned at the telephone number indicated.

Respectfully submitted,

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